



"Lowe, John/DAY"
<John.Lowe@CH2M.com>
06/29/2004 07:11 AM

To
Subject RE: Eagle Zinc-Another Call

EPA Region 5 Records Ctr.



387526

No problem - I need Ross's call in number I no longer have the e-mail with it.

At some point (maybe not on this call), I would like to revisit the selection of the cadmium oral RfD in comment 35. EPA regions vary in how they apply it for calculating screening levels in soil. Regions 6 and 9 use the water ingestion RfD for calculating their screening levels. EPA Region 3 gives you screening levels based on both water and food ingestion. Region 5 doesn't publish its own screening levels, but appears to default to Region 9. Using only the Soil Screening Guidance as the basis for selecting the oral RfD for cadmium is not a strong argument, in the face of other regulatory guidance that points elsewhere. What I can suggest, if you would like to make the argument that the dietary RfD is more appropriate for characterizing noncancer risks from soil ingestion, is to show us the technical argument. Again, even if using the water ingestion RfD overstates cadmium exposure from soil ingestion, cadmium still does not appear to be a driver in the risk assessment. Let me know if you have further questions about this comment.

-----Original Message-----

From: Janet Kester [mailto:jkester@environcorp.com]
Sent: Tuesday, June 29, 2004 2:40 AM
To: Lowe, John/DAY
Cc: Ross Jones
Subject: RE: Eagle Zinc-Another Call

John,
How about 9 am eastern (8 am central)? We wanted to discuss comments 8 and 20. (Ross, any others?)
Thanks,
Janet

-----Original Message-----

From: Ross Jones
Sent: Monday, June 28, 2004 3:58 PM
To: Janet Kester
Subject: FW: Eagle Zinc-Another Call

Can you respond to him? I can do it anytime after 8 am CT

Ross

-----Original Message-----

From: John.Lowe@CH2M.com [mailto:John.Lowe@CH2M.com]
Sent: Monday, June 28, 2004 3:39 PM
To: Ross Jones
Cc: Janet Kester
Subject: RE: Eagle Zinc-Another Call

Sure, if we can do it before 10 Eastern Which comments did you have in mind?

-----Original Message-----

From: Ross Jones [mailto:RJones@Environcorp.com]
Sent: Monday, June 28, 2004 4:39 PM
To: Lowe, John/DAY
Cc: Janet Kester
Subject: Eagle Zinc-Another Call



"Lowe, John/DAY"
<John.Lowe@CH2M.com>
06/28/2004 04:16 PM

To
Subject FW: Eagle Zinc-Another Call.

Dion,

Here's a summary of the comments I discussed with Ross Jones and Janet Kester on Friday. They've asked for another call tomorrow, so I thought I should get a record of the conversation to you as soon as possible.

These will need to be approved by you, of course, but you might want to be aware that they are probably revising the document in accordance with these discussions. They might be assuming that talking with me constitutes your approval. That's an issue which might need to be clarified with ENVIRON. The comments discussed from the May 2nd letter were.

Comment 30 - Might not have resolved this one, because I mistook it for the 1st full para on the page, not 2nd full para - they didn't catch it though. I'll need to revisit it with them. For the second full para, what I propose to ask them to do to resolve this comment is to reword this to take out the language regarding significance of the groundwater pathway, and to add more information from the Phase II investigation to document their contention that groundwater/surface water interaction does not represent potential exposure pathways for metals in groundwater.

Comment 32 - They confirmed that ingestion/dermal contact with Lake Hillsboro surface water was addressed in the risk assessment, and will clarify in the text.

Comment 33 - They stated the location with the maximum cadmium and lead concentrations in sediments was located next to the facility fenceline in an inaccessible location. Ross provided a more detailed description of that specific location. What I suggested was that information be included in the report as a rationale for why risks have not been addressed for concentrations at that location. They said that the inaccessibility was the rationale for not characterizing risks for those pathways, and I replied that the information wasn't in the report. They've agreed to include the description of that site location in the report.

Comment 35 - Janet wants to use the cadmium oral RfD of 0.001 mg/kg-day (for food ingestion) to evaluate cadmium risks from soil ingestion. I directed them to use the more conservative oral RfD of 0.0005 mg/kg-day (for water ingestion). It doesn't make any difference - under the scenarios they are evaluating, cadmium is not a risk driver with either value. Janet continues to argue the point as being more technically defensible - when I continued to object, she pointed out that EPA uses the higher value in developing the soil screening levels for cadmium. At that point, I said I had no objection, if it really is cited in USEPA guidance (I haven't checked the soil screening guidance to confirm this, though, nor other sources such as the Region 9 PRG guidance). The concern I have is that ENVIRON could use this as a precedent in a future project where cadmium is a risk driver, stating that "EPA accepted this at Eagle Zinc". When I speak with them again, I propose to revisit this comment, and make it clear that I do not speak for EPA on this matter.

They asked if there were any other concerns that I had. I mentioned my concern about how residue piles were (or weren't) handled in the risk assessment. They stated that Roy had discussed this issue with you and appeared to achieve a resolution. I don't know how that affects how the residue piles should be addressed in the risk assessment, but my understanding is that the discussion with Roy focused on ecological risk issues, not human health risks. I also mentioned my concern that the air pathway analysis (comment 38) does not reflect site conditions, and needs to be revisited.

I hope you find this information useful. Please contact me at 937.228.3180 x247 if you have any